

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 21-10104-PBS
)	
VLADISLAV KLYUSHIN,)	
)	
Defendant.)	
_____)	

ASSENTED-TO MOTION FOR PROTECTIVE ORDER

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure and Local Rule 116, the United States hereby respectfully submits a proposed protective order – attached as Exhibit A – relating to documents and information produced, and to be produced in the future, in this case and respectfully requests, with the assent of the defendant, that the Court enter the attached order. As grounds for this assented-to motion, the government states as follows.

The Indictment returned in this case alleges securities fraud and conspiracy to commit the same. Many of the documents to be disclosed to the defendant contain personal communications, and personally identifying information and/or financial information (including account numbers) of third parties, including the personal communications and financial records of his alleged coconspirators. Under these circumstances, and consistent with the concerns regarding the protection of personal information reflected in Local Rule 5.3 and Federal R. Crim P. 49.1, the government respectfully submits that the discovery materials should be protected from unnecessary dissemination.

The defendant, through his counsel, assents to this motion and the attached proposed order.

WHEREFORE, the United States, with the assent of the defendant, respectfully requests that this Court enter the proposed protective order attached hereto as Exhibit A.

Respectfully submitted,

RACHAEL S. ROLLINS
United States Attorney

By: /s/ Stephen E. Frank
STEPHEN E. FRANK
SETH B. KOSTO
Assistant U.S. Attorneys

Date: January 24, 2021

CERTIFICATE OF SERVICE

I, Stephen E. Frank, hereby certify that on January 24, 2021, I served a copy of the foregoing on counsel of record in this case by electronic filing.

/s/ Stephen E. Frank
STEPHEN E. FRANK
Assistant U.S. Attorney